Mayo


# INLAND EMPIRE PAPER COMPANY

N. 3320 ARGONNE
SPOKANE, WASHINGTON 99212

PHONE 509/924-1911


August 14, 1984



Ms. Diana G. Banta
E.P.A. Region 10
Pesticides & Toxic Substances Branch
M/S 524
1200 Sixth Avenue
Seattle, WA 98101

Dear Ms. Banta:

On July 17, 1983, Mr. Clyde Anderson, General Manager of Inland Empire Paper Company (IEPCo), received a letter from Mr. Charles E. Findley, Acting Director of EPA's Air and Waste Management Division, concerning two violations of the PCB Regulations. These violations were noted by Dr. Michael Watson on a December 15, 1983, inspection of the mill site. The following advises you of the corrective actions which were taken to bring IEPCo into compliance:

1. Storage -- The leaking PCB capacitor (Westinghouse 4160 volt) which was in storage did not bear the date that it was removed from service and placed into storage for disposal.

   This was corrected immediately after Dr. Watson pointed this out to us on December 15.

   The actual date of removal from service was November 9, 1983. It was noted in Mr. Findley's letter that there was a discrepancy in IEPCo's records as to removal date. The report, dated November 15, 1983, which stated that the capacitor had been removed on November 4 was incorrect. It should have stated that the leaking capacitor was first discovered on November 4, 1983. The November 8, 1983, memo that stated it had not yet been removed from service was correct. IEPCo's 1983 Annual Report pertaining to PCB's does, in fact, bear the proper date.

2. Marking -- The leaking PCB capacitor did not have the proper PCB contaminated marker on its surface.

   The capacitor did have the proper PCB labels on its surface; however, they could not be readily observed due to the fact

that the capacitor in question was completely wrapped in plastic. On the outside of the plastic, IEPCo had attached a home-made label indicating that the enclosed capacitor was PCB contaminated. After Dr. Watson's departure, a legal, 6" x 6" PCB Contaminated label was affixed to the plastic, bearing the date of removal. At that time, labels were placed on the wall behind the storage area.

On January 26, 1984, the capacitor in question was placed in a DOT approved container by the Westinghouse Electric Corporation, under shipping order #SERD-96401, and removed from the mill site. Attached, please note copies of the certifications received on July 18, 1984, from Westinghouse, stating that the capacitor in question was properly disposed of on March 11, 1984. (Please note that the certification was for 3 capacitors. However, it was actually for 3 capacitor cans which comprised the one capacitor in question.)

IEPCo believes that, due to the above actions, we are now completely in compliance with the PCB regulations.

IEPCo is very intent on complying with the PCB regulations and is making every effort to reach this end. To exemplify this, on January 26, 1984, Westinghouse Electric Corporation, under contract by IEPCo, rebuilt the only two transformers at this site which were PCB contaminated, one at 290 ppm, the other at 55 ppm. After the outlined three month operational time, these transformers were certified as PCB free. This was done at a total contract cost of $34,014.10, which does not include the lost production from having the mill down during the decontamination procedure. IEPCo still has capacitors in service which are PCB contaminated, but has set a company policy to replace and properly dispose of all capacitors containing PCB's as funds become available. It is a company goal to have a PCB free mill. In the meantime, we will continue to abide by the current PCB regulations.

If I can be of any further assistance in this matter, please do not hesitate to contact me.

Sincerely,

Wayne Andresen

Wayne Andresen
Technical Superintendent

WDA:ba
Enc.

Westinghouse Electric Corporation
Industry Products Company

Apparatus Service Division
10831 E Marginal Way S
Seattle Washington 98168
(206) 292 4111

July 18, 1984

Inland Empire Paper Co.
N. 3320 Argonne Rd.
Millwood, WA 99212

Attn: Edwin ORR

This letter is to certify that the 3 PCB capacitors delivered to Westinghoue Apparatus Service Plant, Seattle, WA on 1/27/84 were disposed of according to 40CFR Part 761.60 (b) (2) (iii) (A).

Attached are copies of the Texas Waste Manifest, Ticket Number 00804851, and the Certificate of Destruction in which your capacitors were included.

Should you have any questions, please feel free to call.

WESTINGHOUSE ELECTRIC CORPORATION

K. G. Hammond

Rollins Environmental Services (TX) Inc.
P. O. Box 609, Deer Park, Texas 77536 (713) 479-6001

Rollins

June 25, 1984

Westinghouse Electric Corporation
Westinghouse Building
Gateway Center
Pittsburgh, PA 15222

Attn: Mr. Joseph Levine

Dear Mr. Levine:

This is to certify that on February 16, 1984, 6,500 pounds (3 Bins) of PCB capacitors were received from your Seattle, Washington location. This shipment was manifested under the Texas Department of Water Resources Control Ticket Number 00804851.

Incineration of this material was completed on March 11, 1984. Disposal of this material was accomplished in compliance with all applicable federal, state, and local regulations.

Should you require additional information in regard to the disposition of your materials, please feel free to call.

Sincerely,

ROLLINS ENVIRONMENTAL SERVICES (TX) INC.

Tracy Hollister
Plant Superintendent

TH/rj

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION X
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

REPLY TO ATTN OF: M/S 524

CERTIFIED MAIL

NOTICE OF NONCOMPLIANCE

JUL 17 1984

Clyde Anderson, Mill Manager
Inland Empire Paper
N. 3320 Argonne Road
Spokane, Washington 99206

Dear Mr. Anderson:

On December 15, 1983, an Environmental Protection Agency (EPA) inspection was performed by Dr. Michael Watson at Inland Empire Paper Co., Spokane, Washington. The inspection was carried out to determine compliance with the PCB Regulations adopted by EPA pursuant to the Toxic Substances Control Act (TSCA).

During the inspection, violations of the regulations were noted. You should be aware that violations of TSCA may be subject to administrative civil penalties. At the conclusion of the inspection, Dr. Watson discussed his preliminary findings with Wayne Andresen. The following identifies in detail the violations observed during the inspection:

Storage

40 CFR 761.65(c)(8) requires that PCB Articles and Containers be dated on the article or container when they are placed in storage.

The leaking PCB Capacitor (Westinghouse 4160 Volt) that was removed from service on November 4, 1983* did not bear the date that it was removed from service and/or placed into storage for disposal. Your 1983 Annual Report should include the appropriate information concerning this capacitor.

* There is a discrepancy in your records which needs to be clarified. A report dated November 15, 1983 indicated that the leaking capacitor was removed from service on November 4, 1983, while another report dated November 8, 1983 indicated it had not yet been removed from service.

Marking

40 CFR 761.40 requires that PCB Transformers, Large PCB Capacitors, PCB Containers, and storage areas used to store PCBs and PCB Items be marked in accordance with 40 CFR 761.45 unless the Item or Container is too small to accommodate the 6 X 6 inch PCB label.

During the EPA inspection, no label was observed on the Westinghouse 4160 Volt Capacitor removed from service in November 1983. The area used for storing this capacitor also was not marked with the required PCB label.

While the above violations were noted during the inspection, you are to be commended on the PCB program you have maintained and the thoroughness and clarity of your records.

Within 30 days of your receipt of this letter, please advise us of the corrective action which you will take to bring your facility into compliance with the PCB Regulations. Inquiries and correspondence should be directed to Diana G. Banta, EPA Region 10, Pesticides and Toxic Substances Branch, M/S 524, 1200 Sixth Avenue, Seattle, WA 98101; telephone (206) 442-1987.

Sincerely,

(for) Charles E. Findley, Acting Director
Air and Waste Management Division

PS Form 3811, July 1982

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... ____¢
☒ Show to whom, date, and address of delivery .. ____¢
2. ☒ RESTRICTED DELIVERY ..... ____¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

INLAND EMPIRE TOTAL $____

3. ARTICLE ADDRESSED TO:
CLYDE ANDERSON
N. 3320 ARGONNE RD.
SPOKANE, WA 99206

4. TYPE OF SERVICE:
☒ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
P 492 761 941

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
C. Ortingman

5. DATE OF DELIVERY
7/19/84

POSTMARK
SPOKANE, WA COUNTY BR
JUL 19 1984

6. ADDRESSEE'S ADDRESS (Only if requested)
Same as above

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT

★ GPO: 1982-37°

P 492 761 941

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

| | |
|---|---|
| Sent to CLYDE ANDERSON | |
| Street and No. N. 3320 ARGONNE RD. | |
| P.O., State and ZIP Code WA 99206 | |
| Postage | $ |
| Certified Fee | |
| Special Delivery Fee | |
| Restricted Delivery Fee | |
| Return Receipt Showing to whom and Date Delivered | |
| Return Receipt Showing to whom, Date, and Address of Delivery | |
| TOTAL Postage and Fees | $ |
| Postmark or Date JUL 17 1984 | |

PS Form 3800, Feb. 1982

VIOLATION ASSESSMENT

William M. Hedgebeth / EPS
(Name & title of Evaluator)

5-8-84 mmh 7/2/84

| | |
|---|---|
| TSCA | X |
| FIFRA | |

ACTION TAKEN

| | |
|---|---|
| | No Action Indicated |
| X | Notice Noncompliance |
| | Refer for Ad. Civil Penalty |
| | Refer for Criminal Penalty |
| | Refer to State |

Inland Empire Paper Co.
N. 3320 Argonne Rd.
Spokane, Washington 99206

December 15, 1983
Date of Inspection

Dr. Michael Watson
Name of Inspector

Comments:
No previous compliance activity @ facility.

No PCB Transformers (2 PCB-contaminated)
72 capacitors (most PCB)

No indication of other PCBs or PCB Items

Violations

1. Storage - leaking capacitor removed from service not dated when placed in storage. Also, discrepancy on date removed from service in records

2. Marking - capacitor in storage and storage area not marked with M_L.

Deana G. Barta
Concur

Do not Concur

FATES INSPECTION # 831215-1605-01

DATE ENTERED JUL 18 1984

CASE # 10-84200-01-WA

DATE ENTERED JUL 18 1984

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

# EPA TOXIC SUBSTANCES CONTROL ACT
# INVESTIGATION SUMMARY

**11. Facility Name:** Inland Empire Paper Co.

**1. INVESTIGATION IDENTIFICATION**

| Date | Inspector Number | Daily Sequence | 2. Region/State |
|---|---|---|---|
| 12-15-83 | 1605 | 1 | 10 |

**12. Street:** N. 3320 Argonne Rd.

| 3. Inspecting Org. | 4. Contract Number | 5. Contract Work Order |
|---|---|---|
| C ☐ E ☒ S ☐ | | |

| 6. Facility Function | 7. Invest. Type | 8. Reason for Investigation | 13. City | 14. State | 15. ZIP Code |
|---|---|---|---|---|---|
| US | 6PC | NSE | ~~Spokane~~ Millwood | WA | ~~99206~~ |

| 9. Referral Agency | 10. Warrant Required | 16. DUNS Number | 17. SIC Codes |
|---|---|---|---|
| | Yes ☐ No ☐ | 00-906-9279 | 9621 |

## SAMPLE INFORMATION

| 18. Sample Sequence Number | 19. State Sample Number | 18. Sample Sequence Number | 19. State Sample Number |
|---|---|---|---|
| | | | |
| **20. CAS Number** | **21. Project Code** | **20. CAS Number** | **21. Project Code** |
| | | | |
| **22. Sample Medium** | **23. Date Collected** | **22. Sample Medium** | **23. Date Collected** |
| | | | |
| **24. Lot or Other Codes** | **25. Date Shipped** | **24. Lot or Other Codes** | **25. Date Shipped** |
| | | | |
| **26. Sample Identification** | | **26. Sample Identification** | |
| No Samples — Notice of Noncompliance | | | |
| **27. Amount Before Sampling** | | **27. Amount Before Sampling** | |
| | | | |
| **28. Sample Description** | | **28. Sample Description** | |
| | | | |

## OTHER FACILITIES

| 29. Manufacturer/Processor *(Other than above)* | 30. City | 31. State | 32. ZIP Code | 33. DUNS Number |
|---|---|---|---|---|
| | | | | |
| **29. Manufacturer/Processor *(Other than above)*** | **30. City** | **31. State** | **32. ZIP Code** | **33. DUNS Number** |
| | | | | |

## RECORDS

| 34. Original Records | 35. Sample Delivered To | 36. Date | 37. Remarks |
|---|---|---|---|
| | | | |
| **34. Original Records** | **35. Sample Delivered To** | **36. Date** | **37. Remarks** |
| | | | |

## INSPECTION DOCUMENTS

| 38. Credentials Presented | 39. Notice of Inspection | 40. Notice of Confidentiality | 41. Chain of Custody | 42. Receipt for Samples/ Documents | 43. Declaration of Confidentiality |
|---|---|---|---|---|---|
| ☒ | ☒ | ☒ | ☐ | ☐ | ☐ |

| 44. Inspector's Name | 45. Inspector's Signature |
|---|---|
| Michael Watson | JUL 18 1984 |

EPA Form 7740-5 (2-82)

PCB INSPECTION: Inland Empire Paper Co.
N. 3320 Argonne Rd.
Spokane, Wash 99206

M. Watson. 12-15-83

I began the inspection at 10:30 AM on 12-15-83, entered the facility and presented my credentials to the receptionist. I was referred to Mr. Wayne Andresen, Technical Superintendant for the company. Mr. Andresen came to the front office very shortly, and I presented him with my credentials and explained the purpose of my visit. We then went to his office and discussed the proposed inspection, and I presented him with the Notice of Inspection and the Notice of Confidentiality. Chief Officer of Business was identified as Mr. Clyde Anderson, Mill Manager. I was also introduced to Mr. George Logan, Chief Electrician for the company.

Inland Empire Paper Co. occupies a very large group of brick buildings located on the Spokane River east of the main portion of Spokane and somewhat in the obviously "industrial sprawl" portion of the city's eastern expansion. The mill is a large mechanical paper mill, and is not a Kraft process mill. Thus it does not have to contend with the degree of unwanted chemical discharge so common to the Kraft milling process. It is owned by the Spokesman-Review newspapers, according to Mr. Andresen, and is capable of a routine output of about 200 tons per day of paper, 15 per cent of which is used for the Spokesman-Review newspaper publication. The mill buys wood chips, and processes them to pulp and paper by using mechanical methods. They also produce colored (usually green dyed) newsprint, and apparently are the sole suppliers of green newsprint to the San Francisco newspaper, the Examiner.

The plant has approximately 27 transformers, none of which are PCB, and 2 of which are PCB contaminated. Total capacitors at the facility total 72, MOST OF which are PCB. In January of 1984, the plant will totally shut down for 12 hours, so that the two PCB contaminated transformers can be flushed and converted to non-PCB. The company has been planning for some time to convert its total facility to non-PCB. Mr. Andresen was quite concerned about the nearness of the plant to the Spokane River, was quite aware of the dangers of PCB to aquifer and water table , and so forth, and explained that the company wanted to go totally non-PCB in its transformers for these reasons. As I will discuss later, the company appears to have very good records which track the nature of each device on the premesis, and also has annual reports. Mr. Andresen appeared to have been doing a very good job in keeping records current. (see attached copies of representative records for the facility).

We then began to tour the facility, after stopping at the office of Mr. Edwin Orr, Maintenence Supt., where I briefly explained to him the purpose of my visit as well. First stop was at the Motor Control Center for the Company, which contained 5 non PCB transformers and 3 on line PCB capacitors. A photo was taken of the capacitor bank, which was labelled with the yellow PCB sticker. A 4160 volt "surge capacitor was also there previously, but had been removed from service on 4 November 1983 after a small leak had been noted in the unit on 11-8-83 (the dates do not make sense, could they have meant 4 December? See attached records, etc.) This was actually a triad of three capacitors in a single unit, and will be discussed separately at the conclusion of this report as a storage and disposal issue. At the time of the inspection, the leaky bank had been replaced by a non PCB unit surge capacitor. (see records).

Next stop was at the High Grade Control Room, in which were housed transformers with the company code numbers of 21, 22, and 23. Mr. Andresen indicated that these were non PCB transformers. A check of their records revealed a certificate of analysis dated 2-6-80 from Lauck's Laboratories in Seattle, which attested to the fact that these three transformers had been found to all be less than 50 mg/kg (ppm). No labels were on these units, as none were required.

(NEXT PAGE)

We then visited the "2300 Volt Annex", which was located uptstairs via an outdoors access stairway to the third floor. The area contained numerous capacitors. One series was three banks of 180 kvar capacitors, each of them PCB, and each of them labelled as such with the yellow PCB label. Isolated in a "cage" made of strong wire fencing material were two other banks of 15 each capacitors, 1500 kvar each. All of these were PCB capacitors. Although each of them wasn't labelled, the cage and its supports were clearly marked with the PCB labels at numerous points. Each bank was also labelled with the PCB label inside the cage. According to Mr. Andresen, the reason for the cage was to protect against the possibility of electrocution, should someone inadvertantly walk into the hot area. (photo)

As we were leaving the 2300 Volt annex, two large transformers (photos) were seen high on the wall. These were identified as not being the property of Inland Empire Paper, but rather, belonged to Washington Water Power (WWP). Each was a 40:1 ratio current transformer, and served as power intake devices for the plant from WWP. Code numbers, left to right, were 8524 and 8525 for the two transformers. I asked whether or not these were PCB, as there was no label on either transformer. I was told that they were just not sure, as the transformers were not their own. I was then told that they would check them for PCB content when the plant undergoes its planned ~~short~~ power shutdown in January. I suggested that they should get documentation and records on these transformers as soon as possible and label them accordingly, but that I was not sure of their responsibilities under the Act if they in fact did not own the transformers per se. Margo may wish to check this out further.

We next proceeded to the basement transformer station. In the so called "basement south" was located a very large transformer identified as No. 8 on the company records, identified as G.E. Serial No. 1974989. This was pointed out to be a PCB contaminated transformer (55 ppm, according to the available records), and it bore the yellow PCB label. Large transformers identified as Nos. 9, 10, 11, 12, and 13 were also viewed. All are non PCB. No leaks were noted except for a very slight apparent sweating from 9 and 10. We then saw transformer No. 14, which is a PCB contaminated transformer at 290 ppm (see records). This was labeled with the yellow PCB label. The unit was a Westinghouse, Serial No. PCR-9106 (records identify it as PCR-91061).

I then asked to see the storage area in which the previously mentioned leaky capacitor was kept. I was taken to the unoccupied warehouse-like portion of the ground floor of the facility, in which the unit was being stored. As the records indicate, the unit was taken out of service on Friday, 4 November, 1983. This date was not marked on the stored unit, and I pointed this out to Mr. Andresen. The unit (photo) was placed in a seamless metal pan about six inches high, which contained absorbant material. The unit did not appear to be leaking or spilling to any extent, but since the unit was ~~covered by~~ wrapped in a large sheet of plastic, it was difficult to see clearly. ~~The~~ Mr. Andresen indicated that the unit had been checked daily to see if any leaks had occurred out of the pan or the absorbant. The plastic sheet was affixed tightly to the unit by black tapelike material, and the stored unit was labeled with the handwritten sign "PCB CONTAMIATED" (sic) in black letters on a white piece of rectangular paper approx 12 inches by 4 inches. (see photo for better accuracy). Although. I was unable to see clearly through the thick plastic wrapping, ~~but~~ and was not able to see any yellow PCB label on the units inside.

Storage area not marked with m/l. Mw 7-3-84

I then concluded the inspection and reviewed the various findings with Mr. Andresen, along with obtaining and reading through their records and obtaining copies to take with me. I felt that their record keeping was excellent, as the attached copies of log sheet, annual reports for 1980, 81 and 82 will attest. I indicated that the key problem areas appeared to be the following:

(next page)

1. No records or assessment of types of fluid in the two large Washington Water X-Former Power units mentioned previously.
2. No label indicating date of removal from service on the stored capacitors.
3. No official label on the stored units (although they had clearly tried very hard to label it so that others would know that PCB were involved (see photo of hand lettered sign mentioned previously)

Michael Watson 1-27-84

Michael Watson

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

# EPA TOXIC SUBSTANCES CONTROL ACT
## INVESTIGATION SUMMARY

| 1. INVESTIGATION IDENTIFICATION | | | 2. Region/State |
|---|---|---|---|
| Date: 12-15-83 | Inspector Number: 1605 | Daily Sequence: 01 | 10/ WA |

| 3. Inspecting Org. | 4. Contract Number | 5. Contract Work Order |
|---|---|---|
| C ☐ E ☐ S ☐ | | |

| 6. Facility Function | 7. Invest. Type | 8. Reason for Investigation |
|---|---|---|
| paper co. | PCB | neutral ensp. scheme |

| 9. Referral Agency | 10. Warrant Required |
|---|---|
| | Yes ☐ No ☒ |

| 11. Facility Name | 12. Street | 13. City | 14. State | 15. ZIP Code |
|---|---|---|---|---|
| Inland Empire Paper Co. | N. 3320 Argonne Rd. | Spokane, W | Wash | 99206 |

| 16. DUNS Number | 17. SIC Codes |
|---|---|
| | |

### SAMPLE INFORMATION

| 18. Sample Sequence Number | 19. State Sample Number | 20. CAS Number | 21. Project Code | 22. Sample Medium | 23. Date Collected | 24. Lot or Other Codes | 25. Date Shipped |
|---|---|---|---|---|---|---|---|
| NO SAMPLES TAKEN | | | | | | | |

26. Sample Identification: NO SAMPLES TAKEN

27. Amount Before Sampling:

28. Sample Description:

### OTHER FACILITIES

| 29. Manufacturer/Processor *(Other than above)* | 30. City | 31. State | 32. ZIP Code | 33. DUNS Number |
|---|---|---|---|---|
| | | | | |

### RECORDS

34. Original Records: Region 10 EPA, Seattle

| 35. Sample Delivered To | 36. Date |
|---|---|
| | |

37. Remarks:

### INSPECTION DOCUMENTS

| 38. Credentials Presented | 39. Notice of Inspection | 40. Notice of Confidentiality | 41. Chain of Custody | 42. Receipt for Samples/ Documents | 43. Declaration of Confidentiality |
|---|---|---|---|---|---|
| ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |

| 44. Inspector's Name | 45. Inspector's Signature |
|---|---|
| Michael Watson, Ph.D. | Michael Watson |

EPA Form 7740-5 (3-83)

•U.S. GPO: 1983-403-960

INSPECTION FILE

EPA

United States
Environmental Protection
Agency

Region 10
1200 Sixth Avenue
Seattle WA 98101

# Toxic Substances Control Act: Notice of Inspection

| Name & Address of Firm: | Date of Inspection: |
|---|---|
| INLAND EMPIRE PAPER<br>N. 3320 ARGONNE Rd<br>SPOKANE, WASH | 12-15-83<br>Hour:<br>10:30 AM |

**Reason for Inspection:**

☐ For the purpose of inspecting (including taking samples, photographs and other inspection activities) premises in which chemical substances or mixtures or articles containing same are manufactured, processed, or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures or articles within or associated with such premises have been complied with.

☐ For the purpose of inspecting (including taking samples, photographs and other inspection activities) conveyances used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures or articles within or associated with the conveyances have been complied with.

☐ In addition, this inspection extends to (circle appropriate letters):

A) Financial Data
B) Sales Data
C) Pricing Data
D) Personnel Data
E) Research Data

The nature and extent of the data to be inspected as specified in A through E above is as follows:

| Name of Person to Whom Notice of Inspection Was Delivered: | Signature of EPA Inspector |
|---|---|
| WAYNE ANDRESEN<br>TECHNICAL SUPT<br>**Title** | Maurice Watson<br>**Title & Date**<br>TOXICOLOGIST<br>12-15-83 |

1. Plant Representative 2. PCB Compliance Branch File 3. Inspector's File

EPA

United States
Environmental Protection
Agency

Region 10
1200 Sixth Avenue
Seattle WA 98101

# TSCA Inspection Confidentiality Notice

| Facility Name & Address | This Notice Given To |
|---|---|
| INLAND EMPIRE PAPER<br>N. 3320 ARGONNE Rd<br>SPOKANE, WASH | Name: WAYNE ANDERSON<br>Title: TECHNICAL SUPT |
| Name and Address of Chief Officer of Business:<br>CLYDE ANDERSON<br>MILL MANAGER | Date This Notice Mailed To Chief Officer of Business: |
| Inspection Date:<br>12-15-83 | Name of Inspector:<br>MICHAEL WATSON |

It is possible that EPA will receive public requests for release of data and/or documents obtained by inspectors during inspection of the facility indicated above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 522, EPA regulations issued thereunder, 40 CFR Part 2, and the Toxic Substances Control Act Section 14. EPA is required to make documents available in response to FOIA requests unless the Administrator of the agency determines that the data or documents are exempt from disclosure.

Please provide us with a statement specifying any information obtained during our inspection you believe should be exempt from disclosure. This will facilitate the Agency's timely response to any public inquiries, and evaluation of your company's claim of confidentiality.

Your statement should be addressed to: **Document Control Officer, Pesticides & Toxic Substances Branch, M/S 524, U.S. Environmental Protection Agency, 1200 Sixth Avenue, Seattle, Washington 98101,** and should reach this address no later than 7 days after your receipt of this notice. Failure to submit a written request that specified information be characterized as confidential, privileged, or exempt from disclosure within 7 days will be treated by EPA as a waiver of your claims for confidentiality regarding the inspection data. Any non-exempt data may be made available to the public without further notice to you.

12-15
Date Received by Facility

Wayne Anderson
Signature of Plant Representative

1. Plant Representative 2. Chief Officer of Business 3. PCB Compliance Branch File 4. Inspector's File

SERVICE
ANYTIME... ANYWHERE
INSTALLATION & SERVICE ENGINEERING DIVISION

# PCB LOG SHEET

## EQUIPMENT IN SERVICE

1980

| ITEM NO. | DATE LISTED | EQUIPMENT | CLASSIFICATION PCB PCB CONTAM NON PCB | EQUIPMENT LOCATION | TOTAL PCB WEIGHT (KG)* | DATE TO STORAGE/ DISPOSAL | STORAGE/ DISPOSAL FACILITY LOCATION | COMMENTS |
|---|---|---|---|---|---|---|---|---|
| 1 | 2/11 | O.C.B. "W" S/N 1-37Y2813 | Non PCB | Basement South Tank | 205 E | | | |
| 2 | " | O.C.B. "W" S/N 1-37Y2813 | " | Basement Center Tank | " | | | |
| 3 | " | O.C.B. "W" S/N 1-37Y2813 | " | Basement North Tank | " | | | |
| 4 | " | P.T. | " | Basement North | 100 | | | |
| 5 | " | P.T. | " | Basement South | 100 | | | |
| 6 | " | S/N 12216 C.T. "Wagner" | " | Basement South | 40 | | | |
| 7 | " | C.T. GE S/N | " | Basement North | 40 | | | |
| 8 | " | Transformer GE S/N 1974989 | PCB CONTAM " | Basement South | 1200 | | | |
| 9 | " | Transformer GE S/N 1974988 | NON PCB | Basement | 1200 | | | |
| 10 | " | Transformer GE S/N 1974987 | " | Basement | 1200 | | | |
| 11 | " | Transformer "W" S/N SEV8061-01 | " | Basement | | | | |
| 12 | " | Transformer "W" SJB8060-01 | " | Basement | | | | |
| 13 | " | Transformer Wagner S/N B9C1037 | " | Basement | 1950 | | | |
| 14 | " | Transformer "W" S/N PCR-91061 | PCB CONTAM | Basement | 1972 | | | |
| 15 | " | C.T. Wagner S/N 12215 | NON PCB | Basement Storage | 20 | | | |
| 16 | " | C.T. GE S/N 2461862 | " | Basement Storage | 45 | | | |

*ASKERAL = 12.5 LBS/GAL.
OIL = 7.5 LBS/GAL.
(2.2 LBS/KG.)

GENERAL ELECTRIC

SERVICE ANYTIME... ANYWHERE
INSTALLATION & SERVICE ENGINEERING DIVISION

# PCB LOG SHEET

## EQUIPMENT IN SERVICE

| ITEM NO. | DATE LISTED | EQUIPMENT | CLASSIFICATION PCB PCB CONTAM NON PCB | EQUIPMENT LOCATION | TOTAL PCB WEIGHT (KG)* | DATE TO STORAGE/ DISPOSAL | STORAGE/ DISPOSAL FACILITY LOCATION | COMMENTS |
|---|---|---|---|---|---|---|---|---|
| 17 | 2/11 | C.T. Wagner S/N 12214 | NON PCB | Basement Storage | 20 | | | |
| 18 | " | O.C.B. GE TYPE FK20 | " | Sta. Annex North | 4 | | | |
| 19 | " | O.C.B. GE TYPE FK20 | " | Sta. Annex Center | 4 | | | |
| 20 | " | O.C.B. GE TYPE FK20 | " | Sta. Annex South | 4 | | | |
| 21 | " | Transformer A.C. S/N 3755103005 | " | Hi Grade Control Room | 37 | | | |
| 22 | " | Transformer A.C. S/N 2262640 | " | Hi Grade Control Room | 37 | | | |
| 23 | " | Transformer A.C. S/N 3755103005 | " | Hi Grade Control Room | 37 | | | |
| 24 | " | Transformer "W" EAST | " | 3&4 Mach. #3 Basement | 40 | | | |
| 25 | " | Transformer "W" CENTER | " | 3&4 Mach. #3 Basement | 40 | | | |
| 26 | " | Transformer "W" WEST | " | 3&4 Mach. #3 Basement | 40 | | | |
| 27 | " | Basement New Oil Storage | " | | 200 | | | |
| ~~28~~ | ~~4/15/?~~ | Transformer G.E. S/N 1974989 | ~~PCB Contam.~~ | ~~Finishing Room~~ | (SAME AS | ITEM #8) | | |
| 29 | 4/15 | Transformer C. West 25 KVA | Non PCB | Finishing Room | | | | |
| 30 | 4/15 | Transformer W. West 25 KVA | Non PCB | Finishing Room | | | | |
| 31 | 4/15 | Transformer E. GE 25 KVA | Non PCB | Finishing Room | | | | |
| 32 | 4/15 | GE 5 KVA | Non PCB | Yard Storage | | | | |

*ASKERAL = 12.5 LBS/GAL.
OIL = 7.5 LBS/GAL.
(2.2 LBS/KG.)
ISE TN-223(9/79)

GENERAL ELECTRIC

SERVICE ANYTIME... ANYWHERE

INSTALLATION & SERVICE ENGINEERING DIVISION

# PCB LOG SHEET

## EQUIPMENT IN SERVICE

1980

| ITEM NO. | DATE LISTED | EQUIPMENT | CLASSIFICATION PCB PCB CONTAM NON PCB | EQUIPMENT LOCATION | TOTAL PCB WEIGHT (KG)* | DATE TO STORAGE/ DISPOSAL | STORAGE/ DISPOSAL FACILITY LOCATION | COMMENTS |
|---|---|---|---|---|---|---|---|---|
| 1 | 2/11 | CAPACITOR GE 180 KVAR 2300-V | PCB CONTAM | South Sta. Annex | | | | 12 Cans of 1 Gal. Cap. |
| 2 | " | CAPACITOR GE 180 KVAR 2300-V | " | Middle Sta. Annex | | | | ditto |
| 3 | " | CAPACITOR GE 180 KVAR 2300-V | " | North Sta. Annex | | | | ditto |
| 4 | " | 4160 BANK "W" 3000 KVA | " | Station Annex | | | | 30 Capacitors of 100 KV |
| 5 | 4/15/2 | CAPACITOR GE 300 KVA 4100-V | " | Refiner MCC | | | | #1 Sec. Refiner |
| 6 | 4/15 | CAPACITOR GE 300 KVA 4100-V | " | " " | | | | #2 Sec. Refiner |
| 7 | 4/15 | CAPACITOR GE 300 KVA 4100-V | " | " " | | | | #3 Sec. Refiner |
| 8 | 4/15 | CAPACITOR GE 300 KVA 4100-V | " | " " | | | | #4 Sec. Refiner |
| 9 | 11/14 | CAPACITOR "W" (1 EMC?) | " | " " | | | | 4160 REFINER SURGE CAPACITOR |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |

*ASKERAL = 12.5 LBS/GAL.
OIL = 7.5 LBS/GAL.
(2.2 LBS/KG.)

GENERAL ELECTRIC

Laucks
Testing Laboratories, Inc.
1008 Western Avenue Seattle Washington 98104 (206)622-0727
Chemistry, Microbiology, and Technical Services

# Certificate

CLIENT General Electric Company
E. 1809 Trent Avenue
Spokane, WA 99202
Attn: Art Thorson

LABORATORY NO. 69208

DATE Feb. 6, 1980

REPORT ON TRANSFORMER OIL

P.O. 437X6232

Identification: Inland Empire Paper Co. samples submitted 1-30-80

| | | | | | | |
|---|---|---|---|---|---|---|
| 1. | #1 | Basement | South Tank | O.C.B. | W | SN/1-37Y2813 |
| 2. | #2 | Basement | Center " | O.C.B. | W | " |
| 3. | #3 | " | North " | " | " | " |
| 4. | #4 | " | " | P.T. | | |
| 5. | #5 | " | South | " | | |
| 6. | #6 | " | " | C.T. | Wagner | SN/12216 |
| 7. | #7 | " | North | " | G.E. | |
| 8. | #8 | " | South | Trans. | " | 1974989 |
| 9. | #9 | " | | " | " | 1974988 |
| 10. | #10 | " | | " | " | 1974987 |
| 11. | #11 | " | | " | W | SEV8061-01 |
| 12. | #12 | " | | " | W | SJB8060-01 |
| 13. | #13 | " | | " | Wagner | B9C1037 |
| 14. | #14 | " | | " | W | PCR-91061 |
| 15. | #15 | " | Storage | C.T. | Wagner | 12215 |
| 16. | #16 | " | " | " | G.E. | 2461862 |
| 17. | #17 | " | " | " | Wagner | 12214 |
| 18. | #18 | Sta. Annex | North | O.C.B. | G.E. | TYPE FK20 |
| 19. | #19 | " " | Center | " | " | " |
| 20. | #20 | " " | South | " | " | " |
| 21. | #21 | Hi Grade Control | Room | Trans. | A.C. | 3755103005 |
| 22. | #22 | " " | " " | " | " | 2262640 |
| 23. | #23 | " " | " " | " | " | 3755103005 |
| 24. | #24 | 3 & 4 Machine | #3 Basement | " | W | East |
| 25. | #25 | " " | " " | " | " | Center |
| 26. | #26 | " " | " " | " | " | West |
| 27. | #27 | Basement New Oil Storage | | | | |

| Lab No. | PCBs, mg/kg |
|---|---|
| 1 | Less/50 |
| 2 | Less/50 |
| 3 | Less/50 |
| 4 | Less/50 |

Laucks
Testing Laboratories, Inc.
1008 Western Avenue. Seattle. Washington 98104 (206)622-0727
Chemistry, Microbiology, and Technical Services

# Certificate

General Electric Company



LABORATORY NO. 69208

| Lab No. | PCBs, mg/kg |
|---|---|
| 5 | Less/50 |
| 6 | Less/50 |
| 7 | Less/50 |
| 8 | (55) |
| 9 | Less/50 |
| 10 | Less/50 |
| 11 | Less/50 |
| 12 | Less/50 |
| 13 | Less/50 |
| 14 | 290 |
| 15 | Less/50 |
| 16 | Less/50 |
| 17 | Less/50 |
| 18 | Less/50 |
| 19 | Less/50 |
| 20 | Less/50 |
| 21 | Less/50 |
| 22 | Less/50 |
| 23 | Less/50 |
| 24 | Less/50 |
| 25 | Less/50 |
| 26 | Less/50 |
| 27 | Less/50 |

Respectfully submitted,

Laucks Testing Laboratories, Inc.

Timothy E. Runyan

Timothy E. Runyan

TER:ks

GENERAL ELECTRIC

GENERAL ELECTRIC COMPANY . . . E. 1805 TRENT AVENUE, P.O. BOX 2848
TERMINAL ANNEX, SPOKANE, WASHINGTON 99220, Phone (509) 455-6535

STALLATION & SERVICE
ENGINEERING DIVISION

ELECTRICAL & ELECTRONIC
SERVICE DEPARTMENT

April 19, 1982

RE: OIL SAMPLES
YOUR P/O 8014

CC: George Logan
Inland Empire Paper Company

James P. Clift
Purchasing Agent
Inland Empire Paper Company
N. 3320 Argonne
Spokane, Washington 99206

Dear Jim:

Attached is test data from Laucks Lab in Seattle for your 5 oil samples. None of these samples had over 500 PPM PCB, so it will not be necessary for you to label them.

I would suggest that you file this test certificate in a place where it will not get lost. This information may be necessary if you want to repair any of these units in the future.

Also as requested, attached is 6 each of PC-4N PCB label.

Sincerely yours,

R. F. Doupe

Roy F. Doupe
AREA MANAGER

Encls.

RFD/ims

2 dup

Laucks
Testing Laboratories, Inc.
940 South Harney Street, Seattle, Washington 98108 (206)767-5060

437P6320-2

# Certificate

Chemistry, Microbiology, and Technical Services

CLIENT General Electric Company
East 1805 Trent Avenue
Spokane, WA 99220
Attn: Roy F. Doupe

LABORATORY NO. 76310

DATE April 15, 1982

P.O. #SPO820402

REPORT ON OIL

SAMPLE IDENTIFICATION Marked:
1) A-1 GE S/N 1974 989 Trans. Sta.
2) C. West 25KVA Fin. Rm.
3) W. West 25KVA Fin. Rm.
4) E. G.E. 25KVN Fin. Rm.
5) G.E. 5 KVA Yard.

TESTS PERFORMED AND RESULTS:

| | 1 | 2 | 3 | 4 | 5 |
|---|---|---|---|---|---|
| PCBs, mg/kg | 60 | <5 | <5 | <1 | <1 |

Key

< denotes "less than"

Respectfully submitted,

LAUCKS TESTING LABORATORIES, INC.

Timothy E. Runyan

Timothy E. Runyan

TER:ks

~~JULY 1,~~ _____
FEB 9, 1983

SUBJECT: ANNUAL PCB RECORD

REPORTING PERIOD JAN. 1, 82 THRU DEC. 31, 82.

As of December 31, 82 we had on hand at our Inland Empire Paper Co facility 3172 kilograms of PCB insulating fluids. The PCB fluid was located as follows:

2 - TRANSFORMERS (ITEMS #8 & #14 of EQUIPMENT LOG)
36 - CAPACITORS (ITEMS #1-3 of EQUIPMENT LOG)
30 - CAPACITORS (ITEM #4 of EQUIPMENT LOG)

In addition to the above we had _____ kilograms of PCB contaminated insulating fluids located as follows:

There was no storage or disposal of PCB's during this reporting period.

Signature Wayne Andrese

Title Technical Sup't.

Date Feb 9, 1983

~~JULY 1,~~ _____

MARCH 11, 1982

SUBJECT: ANNUAL PCB RECORD

REPORTING PERIOD JAN. 1, 81 THRU DEC. 31, 81.

As of December 31, 81 we had on hand at our Inland Empire Paper Co. facility 3172 kilograms of PCB insulating fluids. The PCB fluid was located as follows:

2 - TRANSFORMERS (ITEMS # 8 & #14 of EQUIPMENT LOG)

36 - CAPACITORS (ITEMS # 1 - 3 of EQUIPMENT LOG)

30 - CAPACITORS (ITEM #4 of EQUIPMENT LOG)

In addition to the above we had _____ kilograms of PCB contaminated insulating fluids located as follows:

There was no storage or disposal of PCB's during this reporting period.

Signature Wayne Andresen

Title Technical Supt.

Date March 11, 1982

JULY 1, 81

SUBJECT: ANNUAL PCB RECORD

REPORTING PERIOD JAN. 1, 80 THRU DEC. 31, 80.

As of December 31, 1980 we had on hand at our IEPCo facility 3172 kilograms of PCB insulating fluids. The PCB fluid was located as follows:

2 - TRANSFORMERS (ITEMS # 8 & #14 of EQUIPMENT LOG)
36 - CAPACITORS (ITEMS # 1-3 of EQUIPMENT LOG)
30 - CAPACITORS (ITEM #4 of EQUIPMENT LOG)

In addition to the above we had _____ kilograms of PCB contaminated insulating fluids located as follows:

There was no storage or disposal of PCB's during this reporting period.

Signature Wayne Andreen

Title Technical Supt.

Date 8/1/81

11-8-83

While cleaning up Refiner MCC Room Barry made noticed oil on 4160V Sw. Gear. Determined it was comming from West. (#4 Secondary) Capacitor. Its a very slow leak.

Got in touch with Westinghouse and following is the procedure Neil recommends.

After cleaning up oil with rags install stainless pan under Capacitor putting clean up rags in it along with an absorbent. Monitor this every 24 hrs. noticing if leak has increased and if pan is catching every thing.

Order new Capacitor and install when down.

Westinghouse can furnish special shipping Container for bad capacitor and catch pan.

Disposal fee app. $5.00 a pound.

G.L.

11-8-83

S-4 Refiner Capacitor

—Neil Peterson - Westinghouse called after 4:00 P.M.

Neil said that we should take Leaking Capacitor out of service as soon as we can. We do not Want to take a chance on a blow up and a big clean up Job.

A catch pan is under the Capacitor and I can not see where any leak is getting the Sawdust wet.

Only S-4 Refiner has to be down for aprox 15 Min. to disconect wires.

The Capacitor can be removed from the top of the of the Switch on the turn. EO.

Ken Hammond
Westinghouse
Seattle 206/292-411

15 Nov 83

Westinghouse 4160 Volt Capacitor

Removed from Service Friday 4 Nov 83
24½" X 27½" X 44½" High

We have a total of one year to dispose of the Leaking Capacitor.

If we have an agent dispose of the Capacitor he must have it disposed of by 4 Nov. 84.

We need to put it in a D.O.T. Approved Container.

If Westinghouse would come ours to change transformer oil they would take our Leaking Capaci. with them. NO Freight Charge.

$2.50 lb. to dispose of it.

24 Hrs down time $18,000.00 to clean transform

Ken Hammond will give us a written Quote for Cleaning transformer oil.

Date: Nov 9, 1983

To: Bob Sellen
From: Wayne Andresen

Subject: PCB Contaminated Transformers

I spoke to Neal Peterson today concerning PCB contamination. He outlined the following:

< 50 ppm PCB - Non Contaminated
≥50 ≤500 ppm PCB - Contaminated w/ PCB's
7500 ppm PCB - Pure PCB

We presently have 3 transformers with PCB's:

1. GE S/N 1974989 So. basement 1200 Kg. PCB ~ 55 ppm
2. "W" S/N PCR-91061 Basement 1972 Kg PCB ~ 290 ppm

Duplicate → ~~3. A-1 GE S/N 1974 989 Annex Sta. ? ~ 60 ppm~~

We presently have the following capacitors contaminated w/ PCB's:

1. 12 Cans of GE 180 KVAR 2300 V South Sta. Annex
2. 12 Cans of GE 180 KVAR 2300 V Middle Sta. Annex
3. 12 Cans of GE 180 KVAR 2300 V North Sta. Annex
4. 30 Cap. of "W" 100 KVAR 4160 V Station annex
5. 4 Cap of GE 300 KVAR 4160 V Refiner MCC

Neal stated that we could possibly eliminate the transformer contamination by flushing the transformer and refilling with non-PCB oil. He said it is costly but worth considering. I think we should have GE give us a cost estimate.

Also, should we not be looking at starting to routinely replacing the contaminated capacitors? I have no idea of the cost; however, we have a very serious potential of a disaster if we did lose PCB's over the Spokane aquifer.

Wayne

CC: Orr

Westinghouse
Electric Corporation

Industry Services
Divisions

10831 E. Marginal Way S.
Seattle, WA 98168
Apparatus Service Division
Plant Services

November 16, 1983

Inland Empire Paper Co.
3320 North Argonne
Spokane, WA 99212

Attn: Mr. Ed Orr

Subject: 1 ea 1000 KVA 1 Ø Transformer
380 Gals 60 PPM PCB
1 ea 3 Ø Transformer Westinghouse
#PCR-91061
1972 Gals 290 PPM PCB

Gentlemen:

In response to our conversation of November 15, 1983 we are pleased to provide the following.

1. Provide men and equipment to customers property at above address to decontaminate the subject transformers.

2. Remove from site and properly dispose of all liquid and contaminated material incidental to job.

3. Refill with new oil.

4. Provide guarantee of remaining below 50 PPM PCB after 90 days in service.

5. Provide sample kit and analysis for after 90 day oil sample.

It is understood our field equipment will have adequate access to the equipment and that the transformers will be de-energized.

We anticipate being able to complete the process in one 12 to 14 hour day beginning at 7:00 AM on the day of your choice which is agreed to be a normal week day. It is possible to perform this process on a weekend as holiday should you desire.

Our price for regular weekday for this service will be $21,088.00.

Title to the waste product shall pass to Westinghouse following placement of the waste product on Westinghouse truck and compliance by purchaser with warranties set forth in section 6 in PCB Additional Terms and Conditions. In the event that any of the above warranties are not complied with by Purchaser, title shall remain with purchaser until warranty(ies) is/are satisfied.

Price is subject to Terms and Conditions listed above and on the reverse side hereof and the PCB Additional Terms and Conditions (copy attached). Notice of objection to any different or additional Terms and Conditions is hereby given.

Thank you for this opportunity to be of service.

Sincerely,

Ken Hammond

K. G. Hammond, Manager
Seattle ASP

KGH/ck
Encl

INLAND PAPER CO 5

CAP BANK Lasellen
12-15-83

INLAND PAPER CAP BANK THRU FENCE Lasellen 6

2300 VOLT MARKS

12-15-83

INLAND PAPER Lasellen CAP BANK THRU FENCE

12-14-83

2300 VOLT ARROW 4

INLAND PAPER CO 8

Lasellen x Former ?
12-15-83

INLAND PAPER CO 10

UNLASELLED x FORMER #2
FROM BPA 12-15-83

INLAND PAPER Lasellen x Former 11

12-15-83

INLAND PAPER CO 9

UNLASELLED x FORMER #1
FROM BPA 12-15-83

CRUDE CASED IN TSD 13

INLAND PAPER
12-15-83

12

CRUDE STORED IN DISPOSAL

INLAND PAPER
12-15-83